

Verzilli & Verzilli and Consultants, Inc. Consulting Economists

Andrew G. Verzilli, Ph.D.
Emeritus Professor of Economics, Drexel University
Andrew C. Verzilli, M.B.A.
Managing Principal

Office Address:
411 North Broad Street
Lansdale, PA 19446

(215) 368-7797
Fax: (215) 368-9006

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Dallas W. Hartman, Esquire
Law Offices of Dallas Hartman, P.C.
2815 Wilmington Road
New Castle, PA 16105

Re: Tina Lindquist

Dear Mr. Hartman:

The following is our analysis of the economic values of the reduction in household services relative to Tina Lindquist. Ms. Lindquist was seriously injured in a work-related accident on September 25, 2002.

Background

Tina Lindquist was born on June 24, 1982. She is presently 23.7 years of age, with an average statistical life expectancy of an additional 56.8 years (Life Tables, 2002).

Ms. Lindquist had her fingers severed in both hands. She had one finger transplanted in her left hand (from a toe) and two of her right hand fingers were re-attached.

The injuries have had a negative impact on her ability to perform household activities. Specifically, 1) she has to take a break after starting tasks (i.e. vacuuming), 2) her hands start to hurt after she starts an activity, 3) she has difficulty carrying things (laundry baskets), 4) it takes her longer to complete tasks, and 5) completed tasks are not at the pre-accident level (i.e. dishes not as clean).

Methodology

Based on data from The Dollar Value of a Day, the economic value of the reduction in services has been estimated to be in the range of 10 to 15 hours per week until age 65.

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As of age 65, the reduction in services has been estimated to be in the range of 16 to 24 hours per week. This range assumes that Ms. Lindquist has experienced a 50% to 75% reduction in the ability to perform household services. The values of the reduction in household services have been estimated based on an average hourly rate of \$11.50 (The Dollar Value of a Day, PA Department of Labor and Bureau of Labor Statistics) to the date that Ms. Lindquist will be age 70. The total offset method has been utilized to estimate future household services (Kaczkowski v. Bolubasz).

Summary of Estimates

Based on the methodology discussed and the information provided to date, we have calculated the values of the reduction in household services, relative to Tina Lindquist, to be in the range of \$315,300 to \$473,000.

The calculations and methodology we utilize are consistent with Pennsylvania damage guidelines and our opinions are presented within a reasonable degree of economic certainty.

The following page is a detailed summary table of the estimates. If you have any questions, please contact us.

Sincerely,



Andrew G. Verzilli, Ph.D.



Andrew C. Verzilli, M.B.A.

Tina Lindquist

Table 1 : Reduction in Household Services

	<u>50% Reduction</u>	<u>75% Reduction</u>	
Past Services	\$ 20,511	\$ 30,767	9/2002 to Present
Future Services	\$ 294,814	\$ 442,221	To Age 70
Total Reduction	\$ 315,325	\$ 472,988	